Connecticut Association of School Business Officials
11 High Gate Lane, West Hartford, CT 06107-1010
Phone/Fax 860.519.0023
www.ct-asbo.org

Testimony before the Transportation Committee March 2, 2016

Regarding: HB 55462 An Act Requiring the Installation of Seat Safety Belts on School Buses

Representative Guerrera and members of the Transportation Committee, I would like to thank you for the opportunity to present testimony regarding HB 5462

My name is Danielle Batchelder and I am Director of Business Services for Winsor Public Schools with over 10 years of experience in this field. I am also on the leadership team of the Connecticut Association of School Business Officials (CASBO), a non-profit professional organization that represents school business officials (SBOs) that work in most of the 169 towns in Connecticut.

CASBO is dedicated to the safety and well being of all students. The efficient and safe transport of children to and from school is paramount in our role as business officials for Connecticut's public schools. It is for this reason that we feel compelled to bring to your attention the following considerations regarding HB 5462:

I'm sure that most of you in this room, once you saw the CASBO heading and my title as a School Business Official presumed that I would be giving testimony opposing seatbelts on school buses based on the enormous cost it would put on every school district in the State of CT and how our school districts can't afford another costly unfunded mandate at a time when all schools systems are struggling financially.

The reality of this bill is that it would be very costly. The average cost to retrofit a bus with seatbelts is $15,000 a bus. The cost to add seatbelts to a new fleet purchase is $10,000 to $12,000 a bus. Windsor Public Schools (WPS) just approved a new 5 year term transportation contract. WPS operates 47 Type I buses. This would be a cost of $705,000 for WPS to retrofit our fleet.

However, that is not what I am here today to talk about. In November 2015, child safety on school buses was discussed again by the Department of Transportation at a meeting of the National Association of Pupil Transportation. The issue of seat belts on buses has been debated for over 40 years. Like many issues, on the surface the answer seems not just obvious but morally justified. Seat belts save lives, so why wouldn't we put them on school buses? Why would we not protect our most precious cargo?

But before relying on moral arguments to drive public health policies, we owe it to the children we are trying to protect and keep safe to examine whether or not the proposed policy **will actually work**. The National Highway Traffic Safety Administration has already done the research!

In 2011, the traffic safety administration considered whether seat belts should be required for every school bus. Administration, economists and engineers did their research and reported that in addition to school buses being very safe, "**regulation requiring seat belts on school buses would very likely lead to more child fatalities each year than the current average of five.**" This increase is due to many factors. For example:

1. **Emergency Evacuation**: Should an issue arise that would require an emergency evacuation of a school bus such as a fire or submersion, seat belts would greatly increase the time required to evacuate. Young children may not be able to unbuckle themselves without assistance and panicked or disoriented students could be trapped by their belts.

2. **3-Point Seat Belt**: School districts use the same buses to transport kindergartners and high school seniors. The size difference of these students could range from 44 inches tall and 46 pounds to 6' 4" tall and 200+ pounds. The 3-point seat belt won't be adjustable for this great variance and improper fit of the belt can result in serious injuries from even a hard stop or what would have been a simple "fender-bender".

3. **2-Point Seat Belt:** If not worn low across the lap, serious internal injuries can result from an abrupt stop. The 2-point seat belt is not retractable and could pose an injury threat if swung around.

Certainly any child fatality is a tragedy. Unfortunately, adding seat belts wouldn't help – and could quite possibly, exacerbate the typical school bus crash.

The second finding comes from a type of analysis known as risk/risk trade-offs. **This type of analysis examines what happens when a rule tries to reduce a risk, and specifically, how other risks increase when one is reduced.**

The National Highway Traffic Safety Administration, through sound risk/risk analysis, found that "a National lap/shoulder belt requirement for large school buses could **result in an increase of 10 to 19 student fatalities annually in the U.S." because of something called "displacement."** Seat belts reduce the number of students that can fit on existing buses, so some students would be forced to walk, ride their bikes or drive in private cars. These forms of transportation are all less safe than traveling by school bus.

Why the change then, in stance from the NHTSA in just four years? It's not because there is more data. In the words of a highway administration executive, "the purpose appears to persuade states into mandating belts to **improve the "confidence" people have in school buses."**

But that sentiment ignores the value of good analysis that uncovers what is really likely to be the outcome of these types of policies. In this case, it shows that it would cost the lives of more American children. This is a rare case where we have great analysis – having this data is rare. Of the 37,000 regulations passed in the 10 years leading up to 2014, only 116 had monetized benefits and costs, and even fewer looked at risk/risk trade-offs.

Kudos to the Department of Transportation for doing this excellent work four years ago – but not so much for ignoring it today. The promise today by the National Highway Traffic Safety Administration, was that they would update their analysis. We need to monitor that updated analysis carefully. **We owe it to the students to make decisions that are truly in their best interest.**

In summary, School bus transportation is one of the safest forms of transportation in the United States. We require all new school buses to meet safety requirements over and above those applying to all other passenger vehicles. These include requirements for improved emergency exits, roof structure, seating and fuel systems, and bus body joint integrity. These requirements help ensure that school buses are extremely safe." The NHTSA feels that the best way to provide crash protection to passengers is through "compartmentalization," in which "buses provide occupant protection so that children are protected without the need to buckle-up.

This bill does not improve safety for students riding large school buses. For the reasons stated, CASBO and Windsor Public Schools strongly urges the Committee to reject this bill.

Thank you.